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Attorney for HONG XIANG DONG

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:20-cr-00108-DC
Plaintiff,)	STIPULATION REGARDING
vs.)	EXCLUDABLE TIME PERIODS
HONG XIANG DONG, YI ZHU LIN, QI)	UNDER SPEEDY TRIAL ACT AND
GUO LIN, HONG JU DONG, AND)	ORDER
QIHUA PAN,)	Date: April 18, 2025
Defendants.)	Time: 9:30am
)	Judge: Dena M. Coggins

STIPULATION

1. By previous order, this matter was set for status on April 18, 2025.
2. By this stipulation, the defendants now move to continue the status conference until July 18, 2025, and to exclude time between April 18, 2025, and July 18, 2025 under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Since the last in court appearance, defense counsel have been offered a complete reiteration of all of the discovery to resolve the concern that some defense counsel may not have received portions of the discovery and for that reason counsel were asked to provide hard drives to facilitate a full duplication

of the materials. On March 10, 2025, the Government discovered a hard drive content of 500 GB of data, which constitutes approximately 250,000 pages of bank records, property records, indicia of ownership, etc. Counsel for the defendants desire additional time to review the voluminous discovery with their clients, conduct investigation and research related to the criminal charges, and otherwise prepare for trial.

- b) Counsel for the defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
- c) The government does not object to the continuance.
- d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 18, 2025 to July 18, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4] because this is a complex case and it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

- 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

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1 **IT IS SO STIPULATED.**

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3 DATED: April 10, 2025

PHILLIP A. TALBERT
United States Attorney

4
5 /s/ Roger Yang
6 ROGER YANG
Assistant U.S. Attorney

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8 DATED: April 10, 2025

9
10 /s/ Malcolm S. Segal
11 MALCOLM S. SEGAL
12 Attorney for Yi Zhu Lin

13 DATE: April 10, 2025

14 /s/ Thomas A. Johnson
15 THOMAS A. JOHNSON
16 Attorney for Hong Xiang Dong

17
18 DATE: April 10, 2025

19 /s/ William F. Portanova
20 WILLIAM F. PORTANOVA
21 Attorney for Qi Guo Lin

22 DATE: April 10, 2025

23 /s/ Jay Rorty
24 JAY RORTY
25 Attorney for Hong Ju Dong

26 DATE: April 10, 2025

27 /s/ Matthew Clinton Smith
28 MATTHEW CLINTON SMITH
Attorney for Qihua Pan

ORDER

IT IS HEREBY ORDERED that the Status Conference scheduled for April 18, 2025, at 9:30 a.m. is VACATED and RESET for July 18, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period between April 18, 2025 and July 18, 2025 inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(ii) and (iv) [Local Codes T2 and T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: **April 10, 2025**



Dena Coggins
United States District Judge